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May 16, 2025

Via ECF

The Honorable Jeannette A. Vargas
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: SEC v. Nader Al-Naji, et al., No. 24-cv-05738 (JAV)

Dear Judge Vargas:

I represent Defendant Nader Al-Naji in the above-captioned matter. Pursuant to Rule 3.E of Your Individual Rules and Practices in Civil Cases, I write, jointly with Plaintiff, to request a continuance of the deadline for all defendants to answer or move against the Complaint. The current deadline is June 6, 2025, and the parties jointly seek an extension to September 5, 2025. This is the sixth request for an extension. Each prior request was granted.

The parties have worked diligently since the previous request for an extension, continuing active discussions about a potential resolution of this case. In particular, the parties have had several in-person, video, and/or telephonic meetings in aid of settlement. The parties agree that additional discussions, including with additional members of the SEC staff and leadership, would aid a potential resolution. The parties correspondingly propose adjourning the initial conference (which the Court reset for June 16, 2025) as well as the deadline to submit a proposed case management plan and scheduling order (which the Court previously set for June 9, 2025) to some time after September 5, 2025, on dates set at the Court's discretion.

Respectfully submitted,

/s/ Christopher J. Carney

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cc: All counsel of record (via ECF)